

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

PATRICIA TOBEN, )  
)  
Plaintiff, )  
)  
v. )  
)  
BRIDGESTONE RETAIL )  
OPERATIONS, LLC, d/b/a )  
FIRESTONE COMPLETE AUTO CARE, )  
)  
Defendant. )

**DECLARATION OF CRAIG WHITE**

Craig White declares as follows:

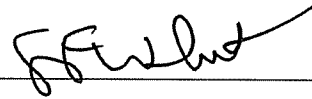
1. I am the Controller of Bridgestone Retail Operations, LLC (“Bridgestone Retail”). In that capacity, I have knowledge of Bridgestone Retail’s corporate structure and principal place of business, as well as its database of customer transactions.
2. Bridgestone Retail is a limited liability company organized under the laws of Delaware. Its principal place of business is in Bloomingdale, Illinois.
3. Bridgestone Retail maintains a computer database containing information on customer transactions involving its retail facilities. The information contained in the database is entered at each store by a Bridgestone Retail service advisor at or near the time of each transaction. The information is kept in the regular course of Bridgestone Retail’s business activities.
4. At my direction, employees of Bridgestone Retail’s Finance Department compiled information from the database to determine the number of Missouri residents who were charged shop supply fees at Bridgestone Retail stores located in Missouri between August 23, 2006 and

the present. During that time period, Bridgestone Retail stores located in Missouri received shop supply fees from more than 100 customers with unique Missouri addresses.

5. Based on information compiled from the same database, Bridgestone Retail stores located in Missouri received in excess of \$5,500,000 in shop supply fees.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 19, 2011

  
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